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Before the
Federal Communications Commission
Washington, D.C. 20554

DEC 29 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of Section 73.202(b))	MM Docket No. 00-6
Table of Allotments)	RM-9791
FM Broadcast Stations)	RM-9890
(McCook, Alliance, Imperial, Nebraska, and)	
Limon, Parker, Aspen, Avon, and Westcliffe,)	
Colorado))	

**JOINT COMMENTS ON
ORDER TO SHOW CAUSE**

The Meadowlark Group, Inc. ("Meadowlark"), permittee of Station KAVD, Limon, Colorado¹ and Imperial Media Association ("Imperial Media"), permittee of Channel 275C, Imperial, Nebraska, (together, "Joint Commenters") file these comments in response to the Commission's Order to Show Cause in the above-captioned proceeding (DA 00-2603, rel. Nov. 17, 2000). As described more fully below, the Joint Commenters have reached an agreement and a technical solution in which (1) Imperial Media consents to a change of class of channel at Imperial, Nebraska and (2) the need for proposed change of channels for Station KPNY(FM), Alliance, Nebraska is eliminated. In support whereof, the Joint Commenters state as follows:

1. In its Counterproposal in this proceeding, Meadowlark proposed that Channel 276C be substituted for Channel 276C1 for Station KAVD(FM), and the station's community of license be changed from Limon to Parker, Colorado. In order to accomplish those changes, Meadowlark requested several other changes to the Table of Allotments, including the substitution of Channel 263C1 for 271C1 at Alliance, Nebraska (Station KPNY) and the substitution of Channel 271C for

1. On November 29, 2000, Meadowlark filed its initial license application.

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275C at Imperial, Nebraska (File No. 19970924ML). The Commission issued an Order to Show Cause to the licensee and permittee of these two stations, respectively.

2. After Meadowlark's Counterproposal was submitted in this proceeding, the Commission issued its *Technical Streamlining Order* creating a new Class C0, intermediate between Class C and C1.² The Joint Commenters, seeking to make use of the greater flexibility granted by the Commission, hereby request the substitution of Channel 275C0 for 275C at Imperial. Meadowlark hereby amends its Counterproposal accordingly. Imperial Media, permittee of Channel 275C at Imperial, hereby consents to modify its operation to Class C0 on its existing channel in exchange for reimbursement. Meadowlark has entered into a reimbursement agreement with Imperial Media for the costs of this change and hereby states that it will reimburse Imperial Media for the reasonable costs of its downgrade in class.

3. As the attached channel study demonstrates, Channel 275C0 at Imperial can be allotted consistent with the Commission's spacing rules which become effective on January 19, 2001.³ With Channel 275C0 allotted to Imperial, the need for a channel change for Station KPNY, Channel 271C1, Alliance, Nebraska is eliminated. Accordingly, Meadowlark withdraws its request for an Order to Show Cause with respect to that station. In addition, as amended herein, the Meadowlark Counterproposal no longer conflicts with the petitioner's proposed allotment of

2. 1998 Biennial Regulatory Review – Streamlining of Radio Technical Rules in Parts 73 and 74 of the Commission's Rules, *Second Report and Order*, FCC 00-368 (rel. Nov. 1, 2000) ("*Technical Streamlining Order*"). The rules adopted therein will become effective 30 days following publication in the Federal Register. The Federal Register publication occurred on December 20, 2000, making the effective date January 19, 2001.

3. See 47 C.F.R. § 73.207(b), Table A, first adjacent channels, C0 to C (220 km) and C to C (241 km).

Channel 271C at McCook, Nebraska. Therefore, both the Meadowlark Counterproposal as amended and the petitioner's proposal in its initial form can be granted together.

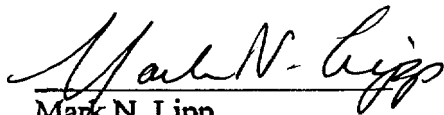
4. Although the *Technical Streamlining Order* will not become effective until January 19, 2001, Meadowlark requests that the Commission act on this proposal immediately, with an effective date after January 19, 2001. Meadowlark also requests expedited action on this proposal in view of the solution offered herein, which eliminates all involuntary channel changes.

WHEREFORE, the Joint Petitioners request that the Table of Allotments be amended to substitute Channel 275C0 for Channel 275C at Imperial, Nebraska. Meadowlark withdraws its request for changes at Alliance and McCook, Nebraska as discussed herein.

Respectfully submitted,

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December 29th, 2000

ENGINEERING STATEMENT

In Support of a SUPPLEMENT

KAVD

Meadowlark Group, Inc.
Coloradio, Inc.

Allocation Study – Channel 275C0, Imperial, Nebraska
[Deleting Ch 275C and substituting Ch 275C0 to allow Ch 276C at Parker, CO]
(Using CP coordinates for Ch 275C at Imperial, NE as reference)

Reference Coordinates:

North Latitude: 40-45-31

West Longitude: 101-52-32

40 45 31 N.			Class C0			Search Date
101 52 32 W.			Current rules spacings			12-29-00
Channel 275 -102.9 MHz						
Call	Ch#	City	State	Bear'	Dist'	R'grd Margin
Community of Imperial			NE	143.1	33.92	
Reference Coordinates:						
North Latitude: 40-30-52						
West Longitude: 101-38-05						
970924	275C	Imperial	NE	0.0	0.00	281.0 -281.00 *
RDEL	275C	Imperial	NE	0.0	0.00	281.0 -281.00 *
RADD	275C1	McCook	NE	125.7	106.34	259.0 -152.66 *
Of no concern: Substitute channel not needed						
KKYT.C	222C1	Holyoke	CO	284.7	45.14	37.0 8.14
KAVD.C	276C1	Limon	CO	226.4	207.43	196.0 11.43
Of Note:						
Facility was short spaced to Ch 275C at Instant reference coordinates. This facility Is no longer short spaced at these coordinates To Ch 275C0.						
RADD	276C	Limon	CO	230.9	234.75	220.0 14.75
Of Note:						
Facility was short spaced to Ch 275C at Instant reference coordinates. This facility Is no longer short spaced at these coordinates To Ch 275C0.						
KXNP	278C1	North Platte	NE	62.3	108.84	94.0 14.84
RADD	276C	Parker	CO	231.4	235.55	220.0 15.55
Of Note:						
Facility was short spaced to Ch 275C at Instant reference coordinates. This facility Is no longer short spaced at these coordinates To Ch 275C0.						
KRQU	275C	Laramie	WY	281.5	307.05	281.0 26.05
RDEL	276C1	Limon	CO	226.8	225.16	196.0 29.16
KKCI	273C1	Goodland	KS	169.9	154.33	94.0 60.33

CERTIFICATE OF SERVICE

I, Joyce H. Crockett, a secretary in the law firm of Shook, Hardy and Bacon, do hereby certify that I have on this 29th day of December, 2000 caused to be mailed by first class mail, postage prepaid, copies of the foregoing "**Joint Comments on Order to Show Cause**" to the following:

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